

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
v.	)	Criminal No. 21-CR-10307-DJC
	)	
TYSON TU,	)	
Defendant.	)	

**UNITED STATES' BILL OF PARTICULARS FOR FORFEITURE OF ASSETS**

The United States of America, by and through its attorney, Rachael S. Rollins, United States Attorney for the District of Massachusetts, hereby files the following Bill of Particulars for Forfeiture of Assets.

On October 14, 2021, a federal grand jury sitting in the District of Massachusetts returned a Two-count Indictment charging defendant Tyson Tu (the “Defendant”), with Receipt of Child Pornography, in violation of 18 U.S.C. § (a)(2)(A) (Count One), and Possession of Child Pornography, in violation of 18 U.S.C. § § 2252A(a)(5)(B) and (b)(2) (Count Two);

The Indictment included a Forfeiture Allegation which gave the Defendant notice that the United States intended to seek forfeiture, pursuant to 18 U.S.C. § 2253, upon conviction of any of the offenses alleged in counts One through Two Indictment, of any visual depiction described in sections 2251, 2251A, 2252, 2252A, 2252B, or 2260 of Chapter 110 of Title 18, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of Chapter 110 of Title 18; (ii) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offenses; and (iii) any property, real or personal, used or intended to be used to commit or to promote the commission of such offenses or any property traceable to such property.

Pursuant to, and without limiting in any manner the Forfeiture Allegation of the Indictment, the United States hereby gives notice that it is seeking forfeiture, without limitation, of the following additional specific property:

- (a) A Samsung Galaxy Note 10+ cell phone, Serial Number RF8M73RP2XX.

Respectfully submitted,

RACHAEL S. ROLLINS  
United States Attorney

By: /s/ Carol E. Head  
JACOBUS SUZANNE  
CAROL E. HEAD  
Assistant United States Attorneys  
U.S. Attorney's Office  
1 Courthouse Way, Suite 9200  
Boston, MA 02210  
(617) 748-3100  
carol.head@usdoj.gov

Dated: February 21, 2023